



Regional Transit

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A Public Transit Agency
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November 19, 2014

Mr. Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Dear Mr. Calfee:

Sacramento Regional Transit (RT) has reviewed the document Updating Transportation Impact Analysis in CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743 (Steinberg 2013) and have the following comments:

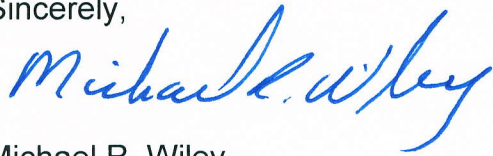
1. We support the VMT assessment methodology.
2. We have concerns using the "average VMT regionwide" as the guidance parameter. In a region like Sacramento (SACOG), the average regional VMT is relatively high given the distances in the rural areas. Utilizing a higher VMT guidance parameter would encourage additional sprawl development. Therefore, we recommend utilizing a guidance parameter such as the "urbanized area average VMT". This parameter would more realistically reflect the goal of SB 743 to encourage infill development and reduce greenhouse gas emissions. OPR should work with the MPO's to determine what "urbanized area" means/is and the methodology to implement this guidance parameter.
3. The SB 743 legislation notes its application specifically to "infill sites" – but we do not see this in the OPR documentation and proposed guidance. We would request it specifically state this CEQA-related VMT assessment is applicable for infill only projects. OPR should work with the MPO's to determine what "infill projects" are defined as. Projects outside of the "infill areas" should be held to a higher test of both a VMT analysis and the standard CEQA-related technical transportation/traffic analysis that is presently required.
4. OPR must work on defining what an "existing major transit stop or high quality transit corridor". Further, we request that OPR also add

language including future stops and corridors as identified in the region's MTP/SCS as being "less than significant"/exempt.

5. We recommend that the guidance clearly state that when a project over burdens an area with vehicular traffic, those impacts shall be mitigated by requiring the developer to adopt transit and pedestrian supportive amenities and services, i.e., subsidizing transit service and transit/pedestrian supportive infrastructure as a mitigation strategy.

Thank you for this opportunity to comment on SB 743 preliminary guidance.

Sincerely,

A handwritten signature in blue ink, reading "Michael R. Wiley". The signature is fluid and cursive, with the first name "Michael" and last name "Wiley" clearly legible.

Michael R. Wiley
General Manager/CEO